II) REMARKS

The claims set forth herein are not amended from the previous submission.

The Examiner has noted that certain trademark terms require capitalization; Applicant previously amended the specification to include such capitalization of trademark terms. If Applicant inadvertently omitted capitalization of any terms, then Applicant respectfully requests the Examiner to specify exactly which terms must still be capitalized.

The Examiner has rejected the claims 1-2, 4, 6, 7-8, and 11-14 under 35 USC 102(e) as being anticipated by U.S. Patent No. 6,484,150 ("Blinn"). Claims 3, 5, 9 and 10 have been rejected under 35 USC 103(a) as being unpatentable over Blinn in view of Official Notice. The Applicant traverses the instant rejection and respectfully requests reconsideration in view of the following remarks.

The present invention, as set forth in claim 1, is a method of enabling a client device to access a primary content file that resides on a primary content server on a network such as the Internet. First, a linkage code that includes a routing identification code and an item identification code is input into the client device. The linkage code is transmitted over the network from the client device to a URL-assembly server on the network. The URL-assembly server extracts the routing identification code from the linkage code and then transmits the routing identification code to a routing server over the network. The URL-assembly server obtains from the routing server a URL template associated with the routing identification code, the URL template including the name of a resolution server and at least one parameter field to be completed by the URL-assembly server. The URL-assembly server completes the URL template by filling in at least the item identification code, and it then returns the completed URL template to the client device. The client device sends the completed URL template to the resolution server named in the URL template to determine the location of the primary content file based on the item identification code. The resolution server returns a primary content URL to the client device that specifies the location of the primary content file at the primary content

server. In dependent claim 2, the primary content file URL is used to provide the primary content file to the client device from a primary content server identified by the primary content file URL.

In claim 13, added in the previous Amendment, a client device identification code is transmitted by the client device to the URL-assembly server along with the linkage code, wherein the client device identification code functions to identify operational characteristics of the client device. In this case, the client device identification code is then transmitted by the URL-assembly server to the routing server along with the routing identification code. The URL template obtained from the routing server is thus associated with the client device identification code and the routing identification code. This provides for device-based routing, where different client devices having different characteristics and thus different client device identification codes may use the same linkage code yet retrieve different primary content files, which will allow for variations in capabilities of the different client devices such as different display capabilities.

The Blinn reference does not teach or suggest this novel and unobvious invention as claimed herein. The Blinn patent relates to a merchant system comprising a dynamic page generator to compose a page for display by processing a template having a database request for page data, and a database module, in communication with a database and with the dynamic page generator, to retrieve page data from the database and to communicate the page data to the dynamic page generator, wherein the retrieved page data corresponds to the database request and wherein the database module retrieves the data in a manner that is independent of any database schema. As described in the specification at column 13, lines 32-53, when a shopper or merchant selects a button or link in a page, the browser returns a URL to the merchant system 120. A URL with a reference to "pgen" invokes the dynamic page generator 125. The dynamic page generator 125 extracts a template name, "template.html", from the URL and retrieves the template.html file from the HTML structures 126. When the template requires data from the database 121, the dynamic page generator 125 passes a query name to the database module 127. The database module 127 uses the query name to retrieve the query from the database 121 and then passes the query to the database 121 for execution. The database 121 in turn

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executes the query and returns the query results to the database module 127 to produce an access object having the query results. The database module 127 returns the access object having the query results to the dynamic page generator 125. The dynamic page generator 125 then processes the access object to extract and format the desired query results in HTML for display on the browser.

There are numerous distinctions between the cited reference and the present invention as claimed. First of all, the Blinn system enables a user to click on a link that generates a URL that invokes a dynamic page generator. The page generator extracts the name of a *template* from the URL and then access the HTML structures file 126 to retrieve *an HTML template.* In stark contrast, the claimed invention uses a linkage code (having a routing ID code and an item ID code) and a URL-assembly server that obtains a *URL template* that has the name of a resolution server and a blank field to be completed by the URL-assembly server. That is, Blinn assembles an HTML document from an HTML template for returning to the browser, which will have certain data requested by the user, while the present invention assembles a URL that is used to ultimately retrieve a file/document (which may or may not be HTML). These are not the same functions.

In addition, in the present invention, the URL-assembly server completes (i.e. assembles) the URL template by filling in the item ID code that was received along with the routing ID code in the linkage code. The Examiner alleges that Blinn describes this function by:

> completing the URL template by filling in at least the item identification code (Col, 13, lines 40-45; Col. 6, lines 40-45, wherein the query is a query to *information contained on the database,* i.e. product information, order information and shopper information, all of *which reads on the item identification code*; Col. 15, lines *45-55)*

Officer action, page 3 (emphasis added). However, in Blinn, as explained by the Examiner, the information used by the dynamic page generator is found on the database 121, which is linked to the database module 127 on the merchant system 120 (see Figure 2 and 5). The Examiner states that this is the same as the item identification code, which is used in the claimed invention to fill in the URL-template. This is an incorrect interpretation of the claim language since the claims clearly states that the item

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identification code is obtained from *the linkage code*, which is input into the client device by the user:

> (a) inputting into the client device *a linkage code* comprising a routing identification code *and an item identification code,*
> (b) transmitting the linkage code *from the client device to the URL-assembly server,* . . .
> (d) completing the URL template by filling in at least the item identification code

Claim 1 (emphasis added). It is clear that the item identification code is received by the URL-assembly server along with the routing identification code (as part of the linkage code input by the user), and it is not part of an external database that is queried by the URL-assembly server. Thus, the information contained on the database *cannot read on the item identification code* as alleged by the Examiner.

It also follows that the Blinn reference does not teach a "linkage code comprising a routing identification code and an item identification code" as set forth in step (a) of claim 1. The Examiner asserts that the URL clicked on by a user such as:

http://server_name/environment.security/pgen/store_name/shopper_id/

is the same as the claimed linkage code. This is a URL used by the merchant system 120 to retrieve an HTML template, while the claimed linkage code is first parsed and then used to retrieve a URL template. Thus, this URL cannot be a linkage code. Moreover, this URL specified by the Examiner does not contain an item identification code that is used to fill in the subsequently-retrieved URL by the URL-assembly server since the shopper_id variable is used to access data from a database (product information, order information, ands shopper information as stated by the Examiner) and is not intended to be inserted directly into the URL being assembled by the URL-assembly server from the retrieved URL template, as set forth in claim 1.

Moreover, the Examiner alleges that the claimed routing identification code is anticipated by Blinn's "template.html" from the subject URL. However, as claimed, the routing identification code is used to obtain a URL template from a routing server (which

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has the name of a resolution server and the blank field that is subsequently completed by the URL-assembly server as just described). This "template.html" of Blinn is used to retrieve an HTML template, not a URL template. Thus, the URL described by the Examiner that allegedly reads on the claimed linkage code also does not have a routing identification code, as defined in claim 1 (in addition to not having an item identification code as defined in claim 1).

In sum, the system of Blinn allows a user to click on a URL, which is sent to a merchant system, and then used to generate an HTML page from (1) an HTML template and (2) customer and/or product information retrieved from a database as a function of a customer ID sent with the URL. That generated HTML page is then returned to the browser for viewing. In contrast, the claimed invention allows a user to send a linkage code that contains two pieces: a routing ID code and an item ID code. The routing ID code is used to retrieve a URL template, and then the item ID code is inserted into the URL template. *The URL template is completed with information that has been passed along with the routing ID code (in the linkage code), and not from an external database that must be queried as in Blinn.* In addition, the claimed invention then takes the completed URL template and accesses the resolution server named in the URL and retrieves a primary content URL that indicates where the primary content file is, based on the item ID code in the completed URL, and the primary content URL is returned to the client. Blinn does not do this.

For at least these reasons, Blinn does not anticipate the invention of claim 1, and claim 1 is patentable over the cited art. Likewise, claim 2, which depends from claim 1, is also patentable for at least these reasons.

Claim 13 also depends from claim 1, and adds the steps of a client device identification code being transmitted by the client device to the URL-assembly server along with the linkage code, the client device identification code functioning to identify operational characteristics of the client device. The client device identification code is then transmitted by the URL-assembly server to the routing server along with the routing identification code, and the URL template obtained from the routing server is associated

with the client device identification code and the routing identification code. This is not taught by Brill. The Examiner states that the "shopper-id security portion" is the client device identification code. However, since the Examiner appeared to previously equate the shopper-id portion to the item ID code, the Applicant is puzzled how this can now be equated to the claimed client device ID code. Moreover, and more importantly, the claim states that the client device identification code *functions to identify operational characteristics of the client device,* and the shopper-id portion does not have anything to do with *the client device.* Thus, the Blinn reference does not teach this claim as well.

For at least these reasons, Blinn does not anticipate the invention of claim 13, and claim 13 is patentable over the cited art. Likewise, claims 3-6, which depend from claim 13, are also patentable for at least these reasons. Claims 7-12 and 14 are similar to the above claims but in system format, and are also patentable for at least the reasons discussed above.

Applicant thus submits that the entire application is now in condition for allowance, early notice of which would be appreciated. Should the Examiner not agree with the Applicants' position, a personal or telephonic interview is respectfully requested to discuss any remaining issues and expedite the eventual allowance of this application.

Respectfully submitted,

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